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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELENA MOIS,)	Case No. 2:15-cv-00143-APG-NJK
)	
Plaintiff,)	
)	
vs.)	<u>STIPULATION AND REQUEST TO</u>
)	<u>EXTEND DEADLINE FOR</u>
)	<u>SUBMISSION OF JOINT PRETRIAL</u>
WYNN LAS VEGAS, LLC, a Nevada Limited)	<u>ORDER</u>
Liability Company,)	
)	
Defendant.)	<u>(First Request)</u> ORDER

The parties, by and through their respective counsel of record, hereby stipulate and request an extension of time to submit their Joint Pretrial Order up to and including May 18, 2018.

1. On April 2, 2018, the Court entered an Order requiring the parties to meet and confer and submit their Joint Pretrial Order by April 27, 2018 (ECF No. 47).

2. The parties have made substantial progress toward completing the Pretrial Order. However, both counsel for Plaintiff and Defendant have had substantial demands on their workload affecting their ability to complete the Pretrial Order. For example, in the past month, counsel for Plaintiff have taken approximately over eight (8) depositions in several cases, which required travel to California and Reno, and conducted four (4) Early Neutral Evaluation ("ENE") and settlement conferences. Moreover, in the next several weeks, counsel for Plaintiff must

1 respond to three (3) pending Motions to Dismiss, a Reply brief to the Nevada Supreme Court,
2 and three (3) additional ENE/settlement/mediations. Similarly, counsel for Defendant had over
3 five (5) settlement and ENE conferences in the past month, served its civic duty by completing
4 jury duty, and conducted over four (4) days of labor negotiations. The labor negotiations will
5 continue in the next several weeks, with additional, all-day sessions already scheduled and
6 confirmed, and other Answers and briefs are due for various cases.

7 3. Additionally, the case involves over 13,000 documents which the parties have had
8 to review for the selection of exhibits as required by Local Rule 16-3(b)(8).

9 4. The parties have communicated and met and conferred regarding the content of
10 the Pretrial Order numerous times, including written correspondence, teleconferences, and an in-
11 person meeting. Indeed, the parties have conferred on April 18, 19, 20, 23, 24, and met for over
12 three (3) hours on April 25, 2018.

13 5. This request for an extension is not sought for the purpose of delay or for any
14 other improper purpose. Rather, it is sought merely to allow the parties sufficient time to prepare
15 the Pretrial Order with the specificity required by Local Rules II 16-3 and II 16-4, and this
16 Court's Order dated April 2, 2018 (ECF No. 47).

17 DATED this 26th day of April, 2018.

18 KEMP & KEMP

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1 WHEREFORE the parties Stipulate and request that the deadline for submission of the
2 Pretrial Order be extended up to and including Friday, May 18, 2018.

3 **IT IS SO ORDERED.**

4 Dated: April 27, 2018.

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7 UNITED STATES DISTRICT JUDGE
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